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## Attorneys for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA ) Case No. 06-0635 SI  
v. )  
THOMAS QUINN, ) STIPULATED NOTICE  
Defendant. ) OF RELATED CASE  
                          ) IN A CRIMINAL ACTION;  
                          ) and [PROPOSED] ORDER

UNITED STATES OF AMERICA )  
v. ) Case No. CR 06-0180 PJH  
SUN WOO LEE; YEONGHO KANG; and )  
YOUNG WOO LEE, )  
Defendants. )

UNITED STATES OF AMERICA }  
v. }  
D.S. KIM, C.K. CHUNG, K.C. SUH, and }  
C.Y. CHOI, }  
Defendants. }  
Case No. CR 06-126 PJH

[CAPTION CONTINUES ON NEXT PAGE]

UNITED STATES OF AMERICA  
v.  
ELPIDA MEMORY, INC.,  
Defendant.

Case No. CR 06-0059 PJH

UNITED STATES OF AMERICA  
v.  
SAMSUNG ELECTRONICS COMPANY,  
LIMITED and SAMSUNG SEMICONDUCTOR,  
INC.,  
Defendants.

Case No. CR 05-643 PJH

UNITED STATES OF AMERICA  
v.  
HYNIX SEMICONDUCTOR INC.,  
Defendant.

Case No. CR 05-249 PJH

UNITED STATES OF AMERICA  
v.  
INFINEON TECHNOLOGIES AG,  
Defendant.

Case No. CR 04-299 PJH

UNITED STATES OF AMERICA  
v.  
T. RUDD CORWIN; HEINRICH FLORIAN;  
GÜNTER HEFNER; and PETER SCHAEFER,  
Defendants.

Case No. CR 04-397 PJH

Under Crim. L. R. 8-1, the United States and Thomas Quinn (“Defendant”), file this  
Stipulated Notice of Related Case in a Criminal Action for this criminal case, United States v.

1       Thomas Quinn, CR 06-635 (SI) to seven previously filed criminal cases assigned to Judge  
2       Phyllis J. Hamilton, United States v. Sun Woo Lee, et al., CR 06-180 (PJH), United States v.  
3       D.S. Kim, et al., CR 06-126 (PJH), United States v. Elpida Memory, CR 06-0059 (PJH), United  
4       States v. Samsung Electronics Company, Limited and Samsung Semiconductor, Inc., CR 05-643  
5       (PJH), United States v. Hynix Semiconductor Inc., CR 05-249 (PJH), United States v. Infineon  
6       Technologies AG, CR 04-299 (PJH), and United States v. T. Rudd Corwin, et al., CR 04-397  
7       (PJH). The United States and Defendant jointly request relating this case to Judge Hamilton.

8           A chronological history of these related criminal cases follows. On September 15, 2004,  
9       the United States filed an Information in United States v. Infineon Technologies AG, charging  
10      Infineon with participating in a conspiracy to fix the prices of DRAM sold to certain computer  
11      manufacturers. On October 20, 2004, Infineon pled guilty for participating in the price-fixing  
12      conspiracy and was sentenced to pay a \$160 million fine before Judge Hamilton. On December  
13      2, 2004, the United States filed an Information in United States v. T. Rudd Corwin, et al.,  
14      charging four individual defendants with participating in the same price-fixing conspiracy in the  
15      DRAM industry. On December 15, 2004, Judge Hamilton sentenced each of the four  
16      individuals. On April 21, 2005, the United States filed an Information in United States v. Hynix  
17      Semiconductor Inc., charging Hynix with participating in the DRAM price-fixing conspiracy.  
18      On May 11, 2005, Hynix pled guilty for participating in the price-fixing conspiracy and was  
19      sentenced by Judge Hamilton to pay a \$185 million fine. On October 13, 2005, the United  
20      States filed an Information in United States v. Samsung Electronics Company, Limited and  
21      Samsung Semiconductor, Inc., charging Samsung with participating in the DRAM price-fixing  
22      conspiracy. On November 30, 2005, Samsung pled guilty for participating in the price-fixing  
23      conspiracy and was sentenced by Judge Hamilton to pay a \$300 million fine. On January 30,  
24      2006, the United States filed an Information in United States v. Elpida Memory, Inc., charging  
25      Elpida with participating in the DRAM price-fixing conspiracy. On March 22, 2006, Elpida  
26      pled guilty for participating in the DRAM price-fixing conspiracy and was sentenced by Judge  
27      Hamilton to pay an \$84 million fine. On March 1, 2006, the United States filed an Information  
28

1 in United States v. D.S. Kim et al., charging four individual defendants with participating in the  
2 DRAM price-fixing conspiracy. On March 15, 2006, Judge Hamilton sentenced each of the  
3 four individuals. Finally, on March 22, 2006, the United States filed an Information in United  
4 States v. Sun Woo Lee, et al., charging three individual defendants with participating in the  
5 DRAM price-fixing conspiracy. On April 2, 2007, Judge Hamilton sentenced two of the three  
6 individuals, Sun Woo Lee and Yeongho Kang. On August 30, Judge Hamilton sentenced the  
7 third individual, Young Woo Lee.

8 The Information charges that Defendant participated in the DRAM price-fixing  
9 conspiracy. There are common events and occurrences alleged in this case and the seven  
10 predecessor cases pending before Judge Hamilton.

11 The assignment of this case to Judge Hamilton is therefore likely to conserve judicial  
12 resources and to promote an efficient determination of the action.

13 Dated: October 6, 2006

14 Respectfully submitted,

15 THOMAS QUINN

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U.S. DEPARTMENT OF JUSTICE

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NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

THOMAS QUINN,

Defendant.

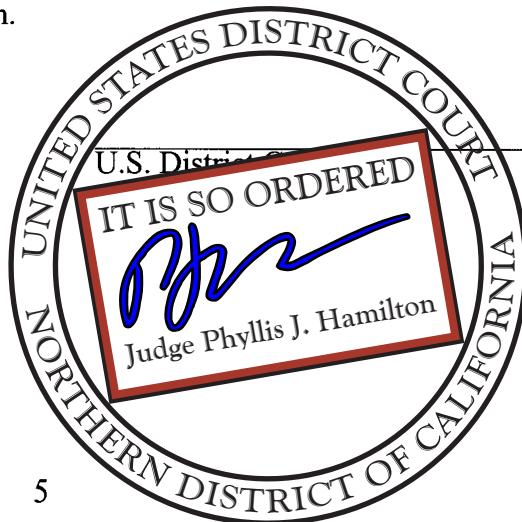
} Case No. CR 06-0635

} **[PROPOSED] ORDER**

} RELATED CRIMINAL CASES

This Court has considered the Stipulated Notice of Related Cases in a Criminal Action under Crim. L. R. 8-1, jointly filed by the United States and defendant Thomas Quinn. Because the assignment of United States v. Thomas Quinn to Judge Phyllis Hamilton is likely to conserve judicial resources and promote an efficient determination of the action, it is ordered that this case is transferred to Judge Hamilton.

Date: October 10, 2006



**CERTIFICATE OF SERVICE**

I, Niall E. Lynch, certify:

That I am a citizen of the United States and am employed by the U.S. Department of Justice, Antitrust Division, at 450 Golden Gate Avenue, Room 10-0101, San Francisco, CA 94102; I am over the age of eighteen years; and am not a party to the within action.

That on October 6, 2006, I sent by fax and United States mail a copy of the following pleadings to the party listed in the foregoing Stipulation.

- 1. Stipulated Notice of Related Cases in a Criminal Action**
  - 2. [Proposed] Order on Stipulated Notice of Related Case in a Criminal Action**

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
October 6, 2006, at San Francisco, California.

Niall E. Lynch